

**HUBBARD & BIEDERMAN, L.L.P.**

ATTORNEYS AT LAW

*A Texas Registered Limited Liability Partnership*

1717 Main Street  
Suite 4700  
Dallas, Texas 75201

Telephone: 214-857-6000

Facsimile: 214-857-6001

www.hblawfirm.com

June 22, 2006

**VIA CM/ECF SYSTEM**

The Honorable F. Dennis Saylor, IV  
Donohue Federal Building  
595 Main Street  
Worcester, MA 01608

Re: **Donald P. Speakman, Stephen H. Wedel and Mark L. Robare v. Allmerica  
Financial Life Ins. & Annuity Co., et al.; 4:04-cv-40077-FDS**

Dear Judge Saylor:

We are pleased to inform the Court that the parties have reached an agreement on Attorneys' Fees subject to your approval in accordance with the terms of the Stipulation of Settlement ("Proposed Settlement"). As set forth in the Proposed Settlement at p. 30, ¶ 8.1, "The Parties in good faith shall seek to agree on an amount for which Plaintiffs' Counsel may submit an application for awards of Attorneys' Fees and Incentive Awards in the Lawsuit, which application Allmerica would not oppose." Today, the parties have agreed that Plaintiffs' Counsel will submit an unopposed Application For An Award of Attorneys' Fees, inclusive of expenses, in the amount of \$2.6 Million to be paid by Defendants. Previously, the parties had reached agreement that the proposed Class Representatives will submit an unopposed Application for Incentive Awards in the total amount of \$60,000.00 or \$20,000.00 each.

As set forth in Plaintiffs' Memorandum In Support of the Joint Motion to Preliminarily Approve Stipulation of Settlement and Entry of Hearing Order, these applications will be filed no later than thirty (30) days before the Fairness Hearing now scheduled for August 11, 2006. Finally, in the proposed Notice to the Class, the blank for proposed Attorneys' Fees and Incentive Awards will be completed.

If the Court has any questions the parties are available to respond at the Court's convenience.

Respectfully submitted,

*/s/ Stephen L. Hubbard*

Stephen L. Hubbard

cc: Andrea J. Robinson, Esq.

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Jonathan A. Shapiro, Esq.

Eric D. Levin, Esq.

Brett R. Budzinski, Esq.